

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SYSMEX CORPORATION and SYSMEX)	
AMERICA, INC.,)	
)	C.A. No. 19-1642-RGA-CJB
Plaintiffs,)	
)	
v.)	JURY TRIAL DEMANDED
)	
BECKMAN COULTER, INC.,)	
)	
Defendant.)	

SYSMEX’S UNOPPOSED MOTION TO EXTEND REDACTION DEADLINES

Plaintiffs Sysmex Corporation and Sysmex America, Inc. (jointly, “Sysmex”) respectfully move this Court to extend the parties’ deadlines to file redacted versions of (1) BCI’s Letter to The Honorable Christopher J. Burke, from James L. Higgins regarding Motion to Stay the Case Schedule Pending the Deposition of Masanori Imazu (“BCI’s Letter,” D.I. 345), (2) Sysmex’s Reply Brief in Support of Their Motion to Dismiss BCI’s Fifth Counterclaim and Motion to Strike BCI’s Sixth Affirmative Defense (“Sysmex’s Reply,” D.I. 346), and (3) Sysmex’s Letter Response to the Honorable Christopher J. Burke Regarding Defendant’s Motion To Stay (“Sysmex’s Letter,” D.I. 349). The grounds for this motion are set forth as follows:

1. BCI’s Letter (D.I. 345), Sysmex’s Reply (D.I. 346), and Sysmex’s Letter (D.I. 349) were filed under seal on August 11, August 12, and August 17, 2021, respectively.
2. Sysmex respectfully requests that the Court extend the deadlines to file redacted versions BCI’s Letter, Sysmex’s Reply, and Sysmex’s Letter to September 3, 2021. Counsel for Sysmex has multiple obligations in this case and others cases, including other personal obligations, which create good cause for a continuance of these redaction deadlines.

3. BCI has informed Sysmex that it consents to an extension of 7 days and takes no position on the duration of the requested extension to the extent it exceeds 7 days for Sysmex to file redacted documents identified in paragraph 1.

For the foregoing reasons, Sysmex respectfully requests that the deadlines to file public versions of BCI's Letter (D.I. 345), Sysmex's Reply (D.I. 346), and Sysmex's Letter (D.I. 349) are extended to September 3, 2021.

OF COUNSEL:

James R. Sobieraj
Robert S. Mallin
Joshua H. James
Daniel Parrish
Alexis White
CROWELL & MORING LLP
455 N. Cityfront Plaza Drive
NBC Tower – Suite 3600
Chicago, IL 60611
(312) 321-4200

/s/ Kelly E. Farnan

Kelly E. Farnan (#4395)
Renée Mosley Delcollo (#6442)
Richards, Layton & Finger, P.A.
One Rodney Square
920 North King Street
Wilmington, DE 19801
302-651-7700
farnan@rlf.com
delcollo@rlf.com

*Attorneys for Plaintiffs Sysmex Corporation
and Sysmex America, Inc.*

Dated: August 20, 2021

RULE 7.1.1 CERTIFICATION

Pursuant to D. Del. LR 7.1.1, counsel for Plaintiffs states that she has conferred with counsel for Defendant and Defendant takes no position on the requested deadlines.

/s/ Kelly E. Farnan
Kelly E. Farnan (#4395)